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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 SCOTT BULLIS,

15 Defendant.

Case No. 2:18-cr-00224-RFB-NJK

**DEFENDANT'S UNOPPOSED  
MOTION FOR PERMISSION TO  
TRAVEL OUT OF THE DISTRICT**

17 Defendant Scott Bullis asks the Court to modify the conditions of his pretrial release to  
18 allow him to travel with his wife and daughter to southern Utah on July 13, 2020, and again on  
19 July 14, 2020, with his family. Title 18, United States Code, Section 3142(c)(3) provides that  
20 a "judicial officer may at any time amend the order to impose additional or different conditions  
21 of release." The Pretrial Services does not oppose this request. The Office of the US Attorney  
22 has stated that they will defer to the Court and Pretrial Services.

23 **Background**

24 On July 13, 2018, Scott Bullis was charged by Complaint with one count of Felon in  
25 Possession of Firearm. ECF No. 1. He made his initial appearance on July 17, 2018, and was  
26

1 released on conditions, including the restriction of his travel to the District of Nevada. ECF No.  
2 3. On July 25, 2018, a grand jury indicted Mr. Bullis on the same charge. ECF No. 12.

3 On August 20, 2019, Mr. Bullis entered a guilty plea to a criminal information without  
4 the benefit of a plea bargain. ECF No. 43-45. On January 9, 2020, the Court conducted a  
5 sentencing hearing. ECF No. 52. The sentencing was continued in order to prepare and submit  
6 an expert report regarding. *Id.* Sentencing is currently set for August 5, 2020. ECF No. 60.

7 **Argument**

8 Mr. Bullis was on release pending trial for almost two years. He has been on release  
9 pending sentencing for almost a year. He previously traveled to California to visit family and  
10 returned successfully without incident. ECF No. 37. During his entire time on supervision, he  
11 has not tested positive for drugs, had any adverse law enforcement contacts, or otherwise failed  
12 to comply with the terms of his release.

13 Mr. Bullis works long hours. He has been very successful, being promoted repeatedly.  
14 He works closely with local law enforcement. Mr. Bullis has been actively participating in  
15 counseling and treatment for his depression arising from the loss of his son. He has cooperated  
16 fully with his Probation Officer.

17 As the Court knows, Mr. Bullis became a father twice while on pretrial release. His  
18 daughter, Jalissa, was born on February 25, 2019, and his youngest daughter, Angelina, born  
19 April 29, 2020. Mr. Bullis and his family request permission to travel to Southern Utah and  
20 Zion National Park on day trips on Saturday, June 13, 2020, and again on Sunday, June 14,  
21 2020.

22 Mr. Bullis requests permission from the Court to drive to Utah with his family in order  
23 for relaxation. They would return home to Nevada Saturday night. Mr. Bullis will work with  
24 probation, providing the address and itinerary. This time together as a family will assist in  
25 strengthening the family bond, which will be pivotal both in assisting Mr. Bullis in reintegrating  
26 into society if he is subject to a custodial sentence.

**Conclusion**

For the foregoing reasons, Mr. Bullis requests the Court's permission to travel with his family to Utah on June 13, 2020, and June 14, 2020, pursuant to 18 U.S.C. § 3142(c)(3).

DATED this 9th day of June, 2020.

Respectfully submitted,

RENE L. VALLADARES  
Federal Public Defender

*/s/ Kathryn C. Newman*  
By \_\_\_\_\_

KATHRYN C. NEWMAN  
Assistant Federal Public Defender

**ORDER**

IT IS SO ORDERED.



\_\_\_\_\_  
RICHARD F. BOULWARE, II  
United States District Judge

**DATED:** June 9, 2020.

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on June 9, 2020, she served an electronic copy of the above and foregoing **DEFENDANT'S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL OUT OF THE DISTRICT** by electronic service (ECF) to the person named below:

NICHOLAS A. TRUTANICH  
United States Attorney  
ALLISON REESE  
Assistant United States Attorney  
501 Las Vegas Blvd. South  
Suite 1100  
Las Vegas, NV 89101

/s/ Marlene Mercado  
Employee of the Federal Public Defender